

9/13/07 Workshop
Irrigated Lands Program
Deadline: 9/4/07 Noon

August 30, 2007



Mr. Ryan Maughan, Division of Water Quality
State Water Resources Control Board
1001 I Street, 15th Floor
Sacramento, CA 95814

Re: Comment Letter - September 13, 2007 Irrigated Lands Program Joint Workshop.

Dear State and Regional Water Board Members:

On behalf of the Environmental Defense Center (EDC) in Santa Barbara, we respectfully submit the following comments regarding the Central Valley's Conditional Waiver program for Irrigated Agriculture. The EDC is a non-profit, environmental law firm working to protect coast and ocean resources, open space and wildlife, and human and environmental health on California's Central Coast. We thank you for the opportunity to provide public comments on this important matter.

In 2004, the EDC participated in a process with members of the RWQCB (Region 9), local farmers, and other members of the environmental community. After nearly two years of collaborative meetings, this group developed a voluntary program aimed at reducing polluted agricultural discharges from irrigated lands. As you have undoubtedly heard, this program includes water monitoring, water quality short courses, implementation of best management practices, reporting and more. To date, we believe this voluntary model has been a success. Most importantly, it was developed in a collaborative manner that, while not perfect, satisfied most participants' major concerns.

Unfortunately, your Board has failed to come up with any program, voluntary or otherwise, that would reduce the amount of contaminated discharges from irrigated lands in the Central Valley. As a result, local drinking water sources in your region continue to be contaminated with toxic runoff and remain among the worst polluted in the State.

The EDC encourages your board to take action to correct this glaring problem. Agricultural producers must not be allowed to continue discharging runoff laden with pesticides and fertilizers into California's waterways. While we realize that the solution will most likely not be a simple 'one size fits all' fix, we strongly believe that corrective actions must be taken immediately. No other industry in California has been given as much freedom to pollute in an unregulated manner as the agricultural industry in the Central Valley.

With this in mind, a collaborative process that includes all stakeholders could prove a powerful tool, and may yield valuable results. If stakeholders are unwilling to participate, or if your Board finds this type of process infeasible or too burdensome, then we ask that you develop strict regulations aimed at correcting this ongoing problem - a concern to many communities in your region.

EDC strongly urges you to act today to stop waiving regulatory requirements for agricultural operations. Either develop a collaborative process aimed at fixing the problem or issue permits to operators of irrigated lands that are truly protective of drinking water sources, natural resources, and other beneficial uses.

Sincerely,



Eric Cárdenas
Central Coast Environmental Health Project director
Environmental Defense Center